

Exhibit 23

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, : MDL NO. 2875
 LOSARTAN, AND :
 IRBESARTAN PRODUCTS : CIVIL NO.
 LIABILITY LITIGATION : 19-2875
 _____ : (RBK/JS)

THIS DOCUMENT APPLIES : HON. ROBERT
7 TO ALL CASES : B. KUGLER

8 - CONFIDENTIAL INFORMATION -
SUBJECT TO PROTECTIVE ORDER

1 May 7, 2021

Videotaped remote deposition of LANCE R. MOLNAR, Ph.D., taken pursuant to notice, was held via Zoom Videoconference, beginning at 9:03 a.m., EST, on the above date, before Michelle L. Gray, a Registered Professional Reporter, Certified Shorthand Reporter, Certified Realtime Reporter, and Notary Public.

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1 Q. Understood. Okay. So let
2 me see if I get this straight.

3 So if something is -- so
4 you're saying that threshold versus
5 non-thresholded is a function of how a
6 particular genotoxic compounds exerts its
7 toxicity?

8 A. It doesn't have to be just
9 genotoxic. It's just how the -- the
10 mechanism through which a compound exerts
11 its toxicity, yes. Or its beneficial
12 effects. It doesn't matter. I think
13 that's what a threshold is, right. So...

14 Q. Right. So what does it mean
15 for a -- in the context of a genotoxic
16 compound for it to be non-threshold?

17 A. Well, something that doesn't
18 exist. That's kind of what I'm pointing
19 out is there's no such thing as a -- that
20 I know of, or that we know of, that is a
21 non-thresholded effect; i.e., a
22 non-threshold effect would mean that a
23 single molecule could be detrimental,
24 right? There's no threshold of exposure

1 You can treat them however you want.

2 The EMA, FDA, ICH, you know,
3 regulatory bodies in general, have
4 decided that that's how they are going to
5 treat them. That's their expectations
6 for deriving limits for them will be.

7 I think the first kind of --
8 what's the word? The first guidance
9 document to that effect is the one that
10 you have on the screen now, from the EMA,
11 and that approach to consider them non --
12 as being a non-thresholded mechanism has
13 continued to this point.

14 Q. And so -- okay. Thank you
15 for that.

16 And so for -- back to this
17 guidance document and the statement that
18 nitrosamines are of such high potency
19 that they have to be excluded from the
20 TTC approach.

21 What do you understand that
22 to mean?

23 MR. TRISCHLER: Objection to
24 form.